

N60200.AR.007138  
NAS CECIL FIELD  
5090.3a

LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING RISK REVIEW  
COMMENTS AND HUMAN HEALTH ASPECTS OF OPERABLE UNIT 2 (OU2) NAS CECIL  
FIELD FL  
9/18/1995  
U S EPA REGION IV



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION 4

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

September 18, 1995

4WD-OHA

MEMORANDUM

**SUBJECT:** Risk review comments, human health aspects,  
NAS Cecil Field OU-2,  
Jacksonville, FL

**FROM:** Ted W. Simon, Ph.D. DABT, Toxicologist  
BRAC Team Risk Assessor  
Office of Health Assessment

**THROUGH:** Elmer W. Akin, Chief  
Office of Health Assessment

**TO:** Bart Reedy, Senior Remedial Project Manager  
FFB/BRAC

Per your request, I have reviewed the **Draft Record of Decision for OU-2**. My comments provided below are divided into two sections, i.e., (1) comments addressed specifically to you, the RPM, and (2) comments that can be conveyed verbatim to the Federal Facility. To facilitate the verbatim conveyance, I will be pleased to provide on request a copy of this memo via cc:mail.

General Comments to the RPM:

It is the policy of the EPA Region IV Office of Health Assessment to require written responses to review comments provided through this office. If a meeting with the facility is needed to discuss these comments, it is requested that any risk assessment comments received from the State or any other source be provided to the Office of Health Assessment for our site file. If risk comments from sources other than this office are forwarded to the Federal Facility, the source should be clearly identified unless concurrence of this office is sought. In this case, we should formally review these comments and provide you with our response before they are forwarded.

Generally, the ROD is without deficiency. The points noted below appear due to haste and will, I expect, be corrected in the final version

I indicated concurrence with the selected remedy at the Proposed Plan stage. This has not changed.

Comments to the Federal Facility:

- 1) Page 4, Section 2.0, Decision Summary, second paragraph.  
It says:

*Small communities and scattered dwellings are in the vicinity of NAS Cecil Field, the closest abuts the western edge of the facility.*

This is a run-on sentence and should be corrected.

- 2) Page 7, Section 2.3, HIGHLIGHTS OF COMMUNITY PARTICIPATION.  
The second bullet mentions the "Risk Assessment Report."  
This is more appropriately called the Baseline Risk Assessment Report.
- 3) Tables 2-2 and 2-4, Noncancer Hazard Index. The Hazard Index for groundwater does not correspond to the HI given in the Final Baseline Risk Assessment. In addition, the HQs in the table add up to 90 no 10. It is vital that these numbers agree with those presented in the BRA. The reviewer believes the source of these mistakes is the use of scientific notation for HQs and HIs. These should be presented as integers when greater than 1 or decimals when less than 1.

This comment was mentioned to Mr. Bob Lunardini of ABB-ES on a conference call on Thursday, Sept. 14, 1995.

Please let me know if I can be of any further help.

T.W. Simon/tws:4WD-OHA:1586/09/18/95/A:\DISK\_6\SEP95\CF\_OU2.ROD